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MEMO ENDORSED

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August 14, 2024

BY ECF AND EMAIL

The Honorable Lewis J. Liman
 The Honorable Jessica G.L. Clarke
 United States District Judges
 Southern District of New York
 500 Pearl Street
 New York, NY 10007
LimanNYSDChambers@nysd.uscourts.gov
ClarkeNYSDChambers@nysd.uscourts.gov

**RE: *U.S. v. Cristian Eustate Espinal, et al. 23 Cr. 577 (LJL)*
*U.S. v. Cristian Eustate Espinal, 23 Cr. 619 (JGLC)***

Dear Judge Liman and Judge Clarke:

I represent Cristian Eustate Espinal, and I am writing to request another 30 day adjournment of the August 16 motions deadline. The Government and other defendants consent to this request.

I am the only counsel who plans to file motions if this case were to go to trial. Counsel for Wellington Espinal, Heriberto Espinal and Roberto Jose Vargas-Paulino have authorized me to represent that they do not intend to file any motions. Counsel for Heriberto Espinal and Mr. Vargas-Paulino have also authorized me to advise that they are having plea discussions with the Government.

I have had several discussions with the prosecutors about resolving Cristian Espinal's charges without a trial. The negotiations are complicated because Cristian Espinal is a defendant in two matters, and the plan is that any disposition would cover both cases.

I am requesting this adjournment because frankly I am concerned that if I file a suppression motion which forces the government to respond, my motion will divert the Government's attention from our negotiations and could result in a less favorable disposition of these matters for Christian Espinal.

**The Honorable Lewis J. Liman
The Honorable Jessica G. L. Clarke
United States District Judges**

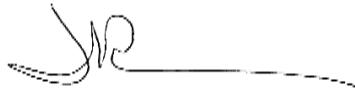
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I candidly believe that Cristian Espinal will not go to trial in either of these cases. Accordingly, extending the deadline for filing motions to September 15, 2024, would not interfere with the other dates established by the Courts.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow
Counsel for Cristian Eustate Espinal

cc: All Counsel (by ECF)

Application GRANTED. The defense pretrial motions deadlines are EXTENDED as follows: Defendant's motion(s), if any, shall be filed by September 16, 2024, Government's responses shall be filed by September 30, 2024. Defendant's reply shall be filed by October 7, 2024. The Court finds that the ends of justice served by excluding the time between September 12, 2024 and September 16, 2024, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because, among other things, the parties are presently engaged in discussions regarding a potential disposition of this matter and the exclusion would allow for those discussions to continue. It is hereby ORDERED that the time between September 12, 2024 and September 16, 2024, is excluded. The Clerk of Court is respectfully directed to terminate the letter motion at ECF No. 32.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: August 22, 2024
New York, New York